UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF VIRGINIA Richmond Division

In re:)	Chapter 11
)	•
CIRCUIT CITY STORES, INC., et al.,)	Case No. 08-35653
)	
Debtors.)	Jointly Administered

JOINDER OF SLAM BRANDS, INC. TO OBJECTIONS OF LG ELECTRONICS USA, INC. AND EASTMAN KODAK COMPANY TO CONFIRMATION OF DEBTORS' CHAPTER 11 PLAN OF LIQUIDATION

Slam Brands, Inc. ("<u>Slam Brands</u>"), by its counsel, Gregory Kaplan, PLC and Graham & Dunn PC, respectfully submits the following Joinder to Objections of LG Electronics USA, Inc. and Eastman Kodak Company to Confirmation of Debtors' Chapter 11 Plan of Liquidation; and in support thereof, states as follows:

1. The Debtors have an objection pending to Slam Brands' claim number 6033 (the "Slam Brands POC"). See Debtor's Nineteenth Omnibus Objection to Claims (Reclassification of Certain Misclassified Claims to Unsecured, Non-Priority Claims) [Docket No. 3703] (the "Claim Objection"). The Slam Brands POC identifies two components to the company's claim: (1) a Section 503(b)(9) claim in the amount of \$539,270.86 (the "503(b)(9) Claim"); and (2) a general unsecured claim in the amount of \$440,476.30. Slam Brands also timely filed a separate claim form solely for the 503(b)(9) Claim using the "503(b)(9) Claim Request Form." The Debtors have not objected to this particular filing.

Troy Savenko (Va. Bar No. 44516)

- 2. In the Plan, the Debtors seek to "temporarily disallow" the 503(b)(9) Claim pursuant to their Plan and 11 U.S.C. § 502(d).
- 3. For the reasons stated in the LG and Eastman Kodak Objections, the Debtors' plan cannot be confirmed in its current form. As such, Slam Brands hereby joins in the Objections of LG Electronics USA, Inc. [Docket No. 5652] and Eastman Kodak Company [Docket No. 5655] to confirmation of the Debtors' Chapter 11 plan of liquidation.

Dated: November 16, 2009 Respectfully submitted,

/s/ Troy Savenko

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- and -

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Co-Counsel to Slam Brands, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on November 16, 2009, a copy of the foregoing JOINDER TO OBJECTIONS OF LG ELECTRONICS USA, INC. AND EASTMAN KODAK COMPANY TO CONFIRMATION OF DEBTORS' CHAPTER 11 PLAN OF LIQUIDATION was served via electronic service upon the parties registered with the Court's CM/ECF Noticing System and served upon the following parties in the manner indicated below:

The Debtor:

Circuit City Stores, Inc. ATTN: Michelle Mosier 4951 Lake Brook Drive, Suite #500 Glen Allen, VA 23060 (Via hand-delivery)

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/s/ Troy Savenko

Counsel